IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

HB Feeder, LLC,) Case Number: 25-cv-04023
)
Plaintiff,) Honorable Matthew F. Kennelly
v.)))
The Partnerships Identified on Schedule A,))
Defendants.	_

(UNKNOWN IF OPPOSED) FIRST MOTION OF DEFENDANT FOR EXTENSION OF TIME TO ANSWER OR PLEAD

NOW COMES the Defendant, (No. 121) Lightinthebox, ("Defendant"), through counsel, and respectfully requests this Court extend the time by 21 days to respond to the Complaint. In support:

- 1. This is the first extension motion filed by the Defendant.
- 2. The Defendant is in settlement negotiations with the Plaintiff.
- The Defendant needs additional time to try and reach an agreement, or if not, respond to Plaintiff's Complaint.

- 4. This Court may, for good cause, extend the time by which Defendant's response is due if a request is made, before the original time or its extension expires. Fed.R. Civ. P. 6(b)(1)(A).
- 5. The Court has set an answer date for all Defendants of July 4, 2025. See Doc. 35.
- 6. The Defendant requests this Court extend the date 21 days from the answer date of July 4 on which Defendant must respond to Plaintiff's Complaint, if ultimately necessary, to July 25, 2025.
- 7. The undersigned contacted Plaintiff's counsel regarding this Motion yesterday morning, but as of this filing, has not received a reply.

WHEREFORE, for the foregoing reasons Defendant (No. 121) Lightinthebox respectfully requests this Honorable Court enter an Order: Extending the date on which its response to Plaintiff's Complaint is due 21 days to July 25, 2025.

July 1, 2025

Respectfully submitted,

s/ Christopher Keleher

Christopher Keleher
The Keleher Appellate Law Group, LLC
1 East Erie St., Suite 525
Chicago, IL 60611
312-448-8491
ckeleher@appellatelawgroup.com

Lan Li Anchor Law LLC 1 E. Erie St., Suite 525 Chicago, IL 60611 312-718-6573 lan.li@anchorlawllc.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies on July 1, 2025 that a true and correct copy of the foregoing document was filed electronically with the Clerk of the Court and served on all counsel of record.

Respectfully submitted,

s/ Christopher Keleher

Christopher Keleher The Keleher Appellate Law Group, LLC 1 East Erie St., Suite 525 Chicago, IL 60611 312-448-8491 ckeleher@appellatelawgroup.com